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10/14/2005 12:23 PM

To Allison Hiltner/R10/USEPA/US@EPA

cc

bcc

Subject Re: Comments on Food Web Model TM

Allison,

We currently have no technical advisor on contract, as WAP's TAG has expired and DRCC/TAG's has not yet been approved.

-BJ

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On Oct 14, 2005, at 10:40 AM, Hiltner.Allison@epamail.epa.gov wrote:

> Duwamish Reviewers:  
 >  
 > Thanks to NOAA, DRCC, and the Suquamish Tribe for their thoughtful  
 > comments on the first of 3 technical memoranda on the food web model  
 > (FWM) for the Lower Duwamish Waterway Superfund site. I have attached  
 > for your information the comments EPA and Ecology sent to LDWG on the  
 > FWM, along with the comments provided by stakeholders and associated  
 > transmittal letters. (The Suquamish Tribe provided their comments via  
 > e-mail, so I have pasted them at the end of this message, and  
 > Denise and  
 > Alison, I did pass your comments on to our reviewers and the PRPs,  
 > even  
 > though it's not reflected in the letter below.) You will note from  
 > our  
 > comments that we shared many of your concerns about the FWM.  
 >  
 > As a reminder, we will meet October 24, 12:30 - 2:30, in EPA  
 > conference  
 > room 15 Denali to discuss the FWM and your comments. BJ, I think it  
 > would be very helpful if your technical advisor could be part of this  
 > meeting. We can bring him by phone if needed. Please let me know if  
 > that would be possible.  
 >  
 > Feel free to call if you have any questions.  
 >  
 > (See attached file: NOAAcmnts\_FWMTechMemo1\_093005.doc) (See attached  
 > file: FWM TM 1 cmt lttrs transmittal.doc) (See attached file: FWM TM 1  
 > comments.doc) (See attached file: FWM TM1 DRCC cmts.doc) (See attached  
 > file: FWM TM 1 cmt letter.doc)  
 >  
 > Suquamish Tribe comments (received 10/13/05):  
 >  
 > In general, the FWM Memorandum 1: Objectives, Conceptual Model and  
 > Selection of FWM does not offer a sufficient basis for selecting a  
 > model, primarily because the evaluation does not define what degree of  
 > accuracy is necessary to make RI/FS decisions using FWM results.  
 >  
 > While the Arnot and Gobas (2004) model may be a good choice, it is

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- > unclear from the information presented how well the model will be able
- > to meet the specifications listed in Section 4.1. For example,
- > what is
- > considered to be sufficient location-specific data and is it (or
- > will it
- > be) available; what are considered to be reasonable or acceptable
- > levels of uncertainty and variability in predicting sediment or tissue
- > concentrations (given the inherent variability in sediment data); will
- > parameter uncertainty also be quantified or evaluated through
- > comparison
- > with empirical data; and how will differences in time response between
- > sediment and biota be incorporated (which may be especially
- > important in
- > the FS for estimating recovery time after remediation)?
- >
- > Additional questions include, is the model accurate across the
- > range of
- > contaminants, as well as across the range of concentrations, and how
- > will multiple contaminants be evaluated?
- >
- > Also, please provide additional detail regarding the preliminary human
- > health risk calculations made using the 2004 fish and crab chemistry
- > data that show that chemical concentrations in seafood will need to be
- > substantially reduced to reach any risk-based goal based on tribal
- > seafood consumption rates (see Section 4.3.1, page 16).
- >
- > Allison Hiltner
- > EPA Region 10
- > phone: (206) 553-2140
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- > hiltner.allison@epa.gov
- > <NOAAcmnts\_FWMTechMemo1\_093005.doc>
- > <FWM TM 1 cmt lttrs transmittal.doc>
- > <FWM TM 1 comments.doc>
- > <FWM TM1 DRCC cmts.doc>
- > <FWM TM 1 cmt letter.doc>